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February 19, 2020

VIA U.S. FIRST-CLASS MAIL & E-MAIL

Administrative Law Judge, Dennis J. Buckley  
P.O. Box 3265  
Harrisburg, PA 17105-3265.  
E-mail: [debuckley@pa.gov](mailto:debuckley@pa.gov)

Re: 600 Scranton LLC v. PPL Electric Utilities  
C-2020-3014952

Dear ALJ Buckley,

Enclosed please find Complainant's Pre-Hearing Memorandum for the Pre-Hearing Conference scheduled for 10:00am Thursday, February 20, 2020 in both Word Format and PDF. Also attached is the Certificate of Service upon the Respondent and Petitioner.

Thank you for your consideration.

Very truly yours,  
**THOMAS J. JONES, JR. P.C.**

*Thomas J. Jones, Jr.*  
Thomas J. Jones, Jr., Esquire

TJJ,Jr./sp  
Enclosures

cc: Kimberly Krupka, Esq. (via e-mail, w/encs.)  
Myles Wren, Esq. (via e-mail, w/encs.)  
David Kurtz (via e-mail, w/encs.)

**THOMAS J. JONES, JR., P.C.**  
By: Thomas J. Jones, Jr., Esquire  
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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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600 SCRANTON LLC	:	
Complainant	:	
	:	
vs	:	C-2019-3014952
	:	
PPL ELECTRIC UTILITIES	:	
Respondent	:	

.....

**600 SCRANTON LLC  
PRE-HEARING CONFERENCE MEMORANDUM**

AND NOW comes the Complainant, 600 Scranton LLC submitting the within Pre-Hearing Conference Memorandum in Advance of the scheduled Pre-Hearing Conference on February 20, 2020, and setting forth the following in support thereof:

- I. Oral Argument on the Petition to Intervene filed by AKSD Discount Stores, LLC d/b/a P&R Discounts and the Objection to the Intervention filed by Complainant, 600 Scranton LLC.
  - a. Complainant objects to Petitioner’s asserting Standing to make Claim for money damages due to a Power suspension by PPL that is Not an Issue in the current case *sui generis*. Further, the Pennsylvania Public Utility Commission has no Jurisdiction to

determine or award claimed money damages in any matter that comes before the Commission.

II. Establishment of Discovery Schedule: (After ALJ Determination of Petition to Intervene)

a. Date for Submission of Interrogatories and/or Depositions. Complainant included with the Formal Complaint, informal Discovery Questions partially Answered by Respondent's proposed Hearing Exhibits 1 and 3. A revised Formal First Set of Interrogatories has been prepared to expedite consideration of the Complaint and it is respectfully requested the ALJ establish a schedule for proponent of Interrogatories and Responses thereto. There is only one witness Complainant may seek to depose depending on the Answers to Complainant's Interrogatories to be received and that would be Brian Stafford, PPL Manager of Account Billing who has personal knowledge of the case.

III. Establishment of a Tentative Litigation Schedule (After ALJ Determination of Petition to Intervene)

DATED: February 19, 2020

Respectfully submitted:  
**THOMAS J. JONES, JR., P.C.**

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Attorney for 600 Scranton LLC

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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600 SCRANTON LLC	:
Complainant	:
	:
vs	: C-2019-3014952
	:
PPL ELECTRIC UTILITIES	:
Respondent	:

.....

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I served a true and correct copy of the Complainant's Pre-Hearing Memorandum that was filed electronically with the Commission upon Administrative Law Judge Dennis J. Buckley, Petitioner and Counsel of Record for PPL in the following manner:

Hon. Dennis J. Buckley Administrative Law Judge  
Pennsylvania Public Utility Commission  
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Harrisburg, PA 17105-3265  
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DATED: February 19, 2020

Respectfully submitted:  
**THOMAS J. JONES, JR., P.C.**

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